

REMARKS

The Examiner has rejected claims 1 – 20 as being anticipated by KOCH. Applicants respectfully traverse.

Independent claim 1 recites forwarding an announcement identification from an SCP to a VXML platform. Claim 8 recites a VXML platform that receives an announcement ID, determines a remote location where the corresponding announcement is stored, and then plays the announcement. Claim 15 recites a platform having a receiving section that receives an announcement ID from an SCP. After receiving the announcement ID, each claim recites analysis of the ID to determine a remote location where the announcement corresponding to the ID is stored.

In contrast, KOCH describes an SCP retrieving an announcement (not an announcement ID). See paragraphs 43 – 45. After the announcement has been retrieved, there is no need to forward the announcement ID for locating the remotely located announcement. Rather, the announcement appears to have been already located by the SCP. It is presumed that the SCP sends the announcement to the VXML gateway, however, the text is not entirely clear on this point. Nevertheless, there is no description or suggestion of receiving an announcement ID at a VXML platform and then analyzing the ID to determine a location of a remotely stored announcement.

In another embodiment, paragraph 61 of KOCH describes the VXML platform actually retrieving announcements. There is no discussion or suggestion of receiving an announcement ID for locating the announcement. It is

submitted that retrieving an announcement is patentably distinguishable from receiving an announcement ID for determining a location of an announcement. Moreover, the embodiment described in paragraph 61 appears to lack an SCP, and thus claims 1 and 15 are further distinguishable from this embodiment because of the claimed interaction with an SCP.

KOCH also lacks the claimed ability to change announcements without affecting the announcement's ID. KOCH does not mention or suggest any such capability.

For all of these reasons, it is requested that the Examiner withdraw the rejections of claims 1, 8, and 15 and provide an indication of their allowability.

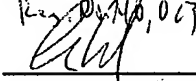
Dependent claims 2 – 7, 9 – 14, and 16 - 20 are also believed to recite further patentable subject matter of the invention and therefore are also believed allowable over the prior art. For example, claims 2, 9, and 16 recite a voice interactive media server (VIMS) component. The portion relied upon by the Examiner (paragraph 35 and Fig. 1) lacks such an element, and merely describes an IP component. Claims 3, 10, and 17 further recite recognizing that the VIMS component will perform the processing based upon how the announcement ID has been encoded. Not only does KOCH lack the claimed announcement ID and VIMS component, but KOCH also lacks any special encoding that indicates that a VIMS component should perform processing. As such, allowance of the dependent claims is deemed proper for at least the same reasons noted for the independent claims, in addition to reasons related to their own recitations. Accordingly, applicants respectfully request reconsideration of

the outstanding rejections and an indication of the allowability of all of the claims in the present application.

The above amendments have been presented merely for the purpose of clarification, and not to overcome the applied prior art. Accordingly, no estoppel is deemed to result from any of the present amendments.

Should the Examiner have any questions or comments regarding this Reply, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully Submitted,
Susanne M. CROCKETT et al.



Bruce H. Bernstein
Reg. No. 29,027

November 14, 2005
GREENBLUM & BERNSTEIN, P.L.C.
1950 Roland Clarke Place
Reston, VA 20191
(703) 716-1191